

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**SEATTLE BANK,**

**Plaintiff,**

**v.**

**NORA G. RAMOS,**

**Defendant.**

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**Civil Action No. 3:22-cv-00140-KC**

**PLAINTIFF’S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Plaintiff Seattle Bank (“Plaintiff”) filed this *Notice of Voluntary Dismissal Without Prejudice* as to Defendant Nora G. Ramos (“Notice”) pursuant to Rule 41 of the Federal Rules of Civil Procedure, and shows the Court as follows:

1. On April 26, 2022, Plaintiff filed its *Original Complaint* (“Complaint”) against Defendant Nora G. Ramos (“Defendant”) to obtain an order authorizing foreclosure of Plaintiff’s security interest on the real property located at 305 Olivia Circle, El Paso, Texas 79912. (ECF No. 1.)

2. The defendant has not answered or otherwise appeared in this action.

3. Plaintiff no longer wishes to pursue this claim for foreclosure against Defendant. Accordingly, it files this Notice, pursuant to Rule 41 (a)(1)(A)(i) of the Federal Rules of Civil Procedure. Plaintiff files this Notice before Defendant filed an answer or motion for summary judgment. As such, Plaintiff voluntarily dismisses the claims it has asserted herein against Defendant Nora G. Ramos without prejudice to the re-filing of the same.

4. This dismissal will finally dispose of all parties and all claims. Defendant will not be prejudiced by this voluntary dismissal.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff respectfully requests the Plaintiff's claims against Defendant Nora G. Ramos be dismissed without prejudice, that no prejudice attach to such dismissal, and that Plaintiff be awarded all other relief to which Plaintiff may be entitled.

Respectfully submitted,

By: /s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**  
Texas Bar No. 00787303  
[mcronenwett@mwzmlaw.com](mailto:mcronenwett@mwzmlaw.com)

**MACKIE WOLF ZIENTZ & MANN, P.C.**  
14160 N. Dallas Parkway, Suite 900  
Dallas, Texas 75254  
214-635-2650 (Phone)  
214-635-2686 (Fax)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on July 27, 2022 as stated below on the following:

**Via U.S. Mail**  
Nora G. Ramos  
402 San Saba  
El Paso, Texas 79912

/s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**